

# **EXHIBIT 11**



Home Office

International Criminality Unit

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organisations/home-  
office](http://www.gov.uk/government/organisations/home-office)

Department of Justice  
Criminal Division  
Office of International Affairs  
1301 New York Avenue NW  
Washington DC 20005  
USA

UKCA Ref: 11088700US

Your Ref: 182-53177

13 December 2017

Dear Sir/Madam

**LETTER OF REQUEST FOR LEGAL ASSISTANCE IN THE MATTER OF MICHAEL  
RICHARD LYNCH & OTHERS (AUTONOMY CORPORATION)**

I write further to your letter of request dated 29 January 2016.

Please find enclosed hard drive and letter from SFO.

Please note that this evidence may not be used for any purpose other than that specified in your letter of request. Should you wish to use this evidence for any purpose which was not outlined in the original request, you must seek the consent of the UK Central Authority in advance of the material being used for such other purpose.

Please note that as your request has now been fully executed, we have closed our file in relation to this matter.

If you require any further assistance from UK Central Authority in relation to this case, please send a supplementary letter of request, quoting the UK Central Authority reference number above.

I would be grateful if you would acknowledge receipt of this letter.

Yours faithfully,

*Deborah Hand*

Deborah Hand  
UK Central Authority  
*On behalf of the Secretary of State*  
D 0207 035 0691  
E [deborah.hand@homeoffice.gsi.gov.uk](mailto:deborah.hand@homeoffice.gsi.gov.uk)  
W [www.gov.uk/mutual-legal-assistance-mla-requests](http://www.gov.uk/mutual-legal-assistance-mla-requests)

**SFO**serious  
fraud  
office2-4 Cockspur Street London SW1Y 5BS  
Director: David Green CB QC**Private & Confidential**Deborah Hand  
UKCA  
International Criminality Unit  
Home Office  
Peel Building 2nd Floor  
2 Marsham Street  
London SW1P 4DF**Your Ref:** I 1088700US**Our Ref:** MLA/USA/96816

13 December 2017

Dear Deborah,

**LETTER OF REQUEST FOR LEGAL ASSISTANCE IN THE MATTER OF  
MICHAEL RICHARD LYNCH & OTHERS (AUTONOMY CORPORATION)**

I refer to the above letter of request dated 1 May 2016 referred to this Office under section 15 (2) of the Crime (International Co-operation) Act 2003 by the Secretary of State. I confirm that evidence has been obtained on behalf of the U.S. authorities.

I enclose the following electronic documents on an encrypted hard drive from Slaughter & May to be transmitted to the U.S. authorities:

| Letter of Request reference | Evidence to be transmitted  |
|-----------------------------|---|
| Page 6                      | <ol style="list-style-type: none"> <li>1. Snapshot of the contents of the 1Room before it was closed down in 2013.</li> <li>2. Copies of documents provided by Autonomy officials to Slaughter and May via email for uploading to 1Room in the period 01/07/2011- 31/10/2011.</li> <li>3. Communications relating to the setting up of the 1Room hosted by Rackspace Managed Hosting Limited.</li> <li>4. Affidavit of Jonathan Cotton of Slaughter and May.</li> <li>5. SFO Letter dated 13 December 2017 to the U.S. DOJ.</li> <li>6. Letter dated 20/10/2017 from Slaughter &amp; May to the SFO.</li> </ol> |

Please note that the password to the encrypted hard drive will be given to you by email. If you have any queries regarding the above, please do not hesitate to contact me.



**SFO**

serious  
fraud  
office

2-4 Cockspur Street London SW1Y 5BS  
Director: David Green CB QC

Yours sincerely,

*Clyde Marklew*

**Clyde Marklew**

Senior Investigator

Direct Tel: +44 (0)20 7239 7321

Email: [clyde.marklew@sfo.gsi.gov.uk](mailto:clyde.marklew@sfo.gsi.gov.uk)





**SFO**

serious  
fraud  
office

2-4 Cockspur Street London SW1Y 5BS  
Director: David Green CB QC

Robert Leach  
Trial Attorney  
U.S. Department of Justice  
Criminal Division, Fraud Section

Your Ref: DOJ No. 182-41909

Our Ref: MLA/USA/01812

Date: 13 December 2017

Dear Robert

**RE: MICHAEL LYNCH, SUSHOVAN HUSSAIN, STEPHEN CHAMBERLAIN,  
ANDREW KANTER AND ANGELA BACARES**

I refer to the letter of request dated 28 May 2017 referred to this Office under section 15(2) of the Crime (International Co-operation) Act 2003 by the Secretary of State for the Home Office.

We enclose evidence obtained from Slaughter and May. This includes one encrypted hard drive and signed affidavit. The evidence enclosed on the hard drive is detailed in broad terms in the attached letter from them dated 20 October 2017:

1. Snapshot of the contents of the 1Room before it was closed down in 2013.
2. Copies of documents provided by Autonomy officials to Slaughter and May via email for uploading to 1Room in the period 01/07/2011- 31/10/2011.
3. Communications relating to the setting up of the 1Room hosted by Rackspace Managed Hosting Limited.

The password for the encrypted electronic material will be sent to you by email.

Please note that we have not conducted a review of this material but have relied on the description above to identify the content of the material produced. There does appear to be personal data included on the hard drive and we expect that you will apply appropriate safeguards to this material. Should you find that material has been omitted please let me know so that I can take steps to remedy the position. Should you find that Slaughter & May have provided material that was not within the scope of your letter of request or is otherwise sensitive or irrelevant, I would be grateful if you would delete it or otherwise embargo it and notify me immediately.

Should you have any further questions regarding this material please do not hesitate to contact me.



**SFO**

serious  
fraud  
office

2-4 Cockspur Street London SW1Y 5BS  
Director: David Green CB QC

Yours sincerely

A handwritten signature in cursive script, appearing to read 'C. Marklew'.

**Clyde Marklew**  
Senior Investigator  
International Assistance  
Direct Tel: +44 (0)20 7239 7321  
Email: [clyde.marklew@sfo.gsi.gov.uk](mailto:clyde.marklew@sfo.gsi.gov.uk)

## SLAUGHTER AND MAY

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By email and by hand

20 October 2017

Serious Fraud Office  
2-4 Cockspur Street  
London  
SW1Y 5BS

Your reference  
MLA/USA/96816  
Our reference  
JCC/SCHO/TZB  
Direct line  
+44 (0)20 7090 4090

For the attention of Clyde Marklew

Dear Sirs

Investigation into the affairs of Michael Lynch, Sushovan Hussain, Stephen Chamberlain,  
Andrew Kantner and Angela Bacares

1. We refer to the notice dated 31 August 2017 and issued under Section 2 of the Criminal Justice Act 1987 requiring Slaughter and May (the "Firm") to produce certain documents to you for onward production to the United States Department of Justice (the "Notice").
2. We also refer to the communications between you and this Firm regarding the scope of the Notice and timing for our response, including our email of 18 July 2017 (Cotton), your email (Marklew) of 28 September 2017, our email (Cotton) of 6 October 2017, and your email (Marklew) of the same date.
3. We have gathered information to respond to the requests through the use of electronic searches using key words and other methods.

Request 1

4. As discussed, there is no pre-existing list of documents uploaded to the 1Room. However, as agreed, please see the folder entitled 'Request 1' on the USB drive entitled 'Slaughter and May's response to the SFO's Notice dated 31 August 2017' for copies of all documents we believe were located on the 1Room as at June 2013.
5. By way of background, we understand that access to the 1Room for individuals external to this Firm was deactivated on 19 September 2011. In November 2012, access to the 1Room for this Firm's deal team was deactivated. In June 2013, the external server on which the 1Room was hosted was closed down. Prior to closure, a copy of the contents of the 1Room was taken. Please note that the copy therefore represents a snapshot of the contents of the 1Room as at June 2013. We understand that it was possible for

SJ Cook  
SM Edge  
NPG Boardman  
PFJ Bennett  
CM Horton  
PP Chappetta  
PH Stacey  
CHY Underhill  
QA Warrham  
DL Finkler  
MD Bennett  
RD de Carlo  
SP Hall  
A Bairo

JD Boyce  
MEM Hatnell  
N von Bismarck  
PWH Brian  
JM Fern  
AC Johnson  
SR Galbraith  
SRB Powell  
AG Ryde  
JAD Marks  
DA Wittmann  
TS Boxall  
SJ Luder  
AJ McClean

JO Twentymen  
DJG Scheffer  
STM Lee  
AC Cleaver  
DR Johnson  
S Siddons  
RA Swallow  
CS Cammion  
CA Corinelly  
PJ Cronin  
BJ-PF Louvesaux  
E Michael  
RR Ogle  
PC Snel

HL Davies  
JC Purnis  
RA Sumray  
JC Cotton  
RJ Tunstall  
WNO Watson  
CNR Jeffs  
SR Nicholas  
MJ Tobin  
DG Widdows  
BKP Yu  
EC Brown  
RA Chaplin  
J Edwards

AO Jolly  
S Maudgill  
JS Novitt  
JA Papanchola  
JM Zaman  
RA Byk  
GA Miles  
GE O'Keefe  
T Pharoah  
MD Zerdin  
RL Cousin  
BJ Kingsley  
IAM Taylor  
DA Ives

MC Lano  
LMO Chung  
RJ Smith  
MDAS Corbett  
PR Dickson  
IS Johnson  
RM Jones  
EJ Fife  
JP Stacey  
LJ Wright  
JP Clark  
WHJ Ellison  
AM Lyle-Smyth  
SC Mackinay

A Nassiri  
DE Robertson  
TA Vickers  
RA Innes  
CP McGarrin  
CL Phillips  
SVK Wokes  
NSA Borsad  
MUM Cox  
RCT Jones  
V MacDuff  
PL Mudo  
OI Storey  
DM Taylor

RJ Todd  
WJ Tuttle  
OJ Wickar  
DUO Baldo  
CVK Boney  
P de Falco  
SNL Hughes  
PR Linnard  
KA O'Connell  
N Young

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by the Solicitors  
Regulation Authority  
Firm SRA number 65398

LY 547755002



## SLAUGHTER AND MAY

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documents to be added/removed during the period the 1Room was active and no audit trail was kept of such additions/removals.

6. Please see our response to Requests 2 and 3 below, for copies of the documents provided to this Firm for upload to the 1Room and the name of the Autonomy official who provided them.

### Requests 2 and 3

7. Our searches identified that documents for the data room appear to have been sent to us as attachments to emails and on portable storage devices.
8. Please see the folder entitled '*Requests 2 and 3 (A)*' on the USB drive entitled '*Slaughter and May's response to the SFO's Notice dated 31 August 2017*' for copies of documents sent to this Firm by Autonomy officials via email for uploading to 1Room in the period 1 July 2011 – 31 October 2011 (the "Relevant Period").
9. As specified in the Notice, we have not provided you any privileged material, such as the emails to which the documents provided by Autonomy officials to this Firm were attached. However, as requested, we have identified the individuals from Autonomy responsible for providing us the documents. With the exception of documents smad001:00002601; smad001:00002607; and smad001:00002218, which were provided by Mr Richard Gaunt, the documents smad001:00005394; smad001:00005406; and smad001:00005429 provided by Mr Stephen Chamberlain, all material provided to this Firm by Autonomy was sent by Mr Andrew Kantner.
10. Please also see the folder entitled '*Requests 2 and 3 (B)*' on the USB drive entitled '*Slaughter and May's response to the SFO's Notice dated 31 August 2017*' for copies of all documents sent to this Firm on portable storage devices by Mr Andrew Kantner for uploading to the 1Room.

### Request 4

11. Please see the folder entitled '*Request 4*' on the USB drive entitled '*Slaughter and May's response to the SFO's Notice dated 31 August 2017*' for copies of all emails between members of this Firm in the Relevant Period relating to the setting up of the 1Room. As previously explained, we understand that the dataroom was branded as a Slaughter and May "1Room", but was a third party proprietary software product/platform called eRoom7, supplied to the Firm by a company called Documentum and hosted for the Firm by RackSpace Managed Hosting Limited.
12. Please note that, where appropriate, redactions have been made to privileged material contained in the emails responsive to Request 4.

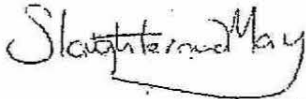


## SLAUGHTER AND MAY

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London EC1Y 8YF  
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13. Please let us know if you have any questions on any of the above by contacting Jonathan Cotton of this Firm.

Yours faithfully,

A handwritten signature in dark ink, appearing to read "Jonathan Cotton", written over a horizontal line.

Encs.

**CERTIFICATE OF AUTHENTICITY OF  
BUSINESS RECORDS**

1. I, Jonathan Charles Cotton, attest on penalty of criminal punishment for false statement or false attestation that I am a Partner of Slaughter and May.


I further state that each of the records supplied on the USB drive entitled '*Slaughter and May's response to the SFO's Notice dated 31 August 2017*' is a duplicate of the original of records that I believe were or are in the custody of Slaughter and May.

I further state that:

- (A) Such records were kept in the course of a regularly conducted business activity;
- (B) The business activity made the records as a regular practice; and
- (C) If any of such records is not the original, such record is a duplicate of the original.

  
\_\_\_\_\_  
J. C. COTTON  
Signature

20 OCTOBER 2017  
Date

  
Sworn to or affirmed before me SAMANTHA HAWLEY (Name), a

Commissioner of Oaths (Commissioner of Oaths, judicial officer etc), on

20 (day) of October (Month) 2017.

At 1 Bankhill Row, London, EC1Y 8YY.

ADDLESHAW GODDARD LLP  
60 CHISWELL STREET  
LONDON  
EC1Y 4AG